

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOURNEY NEWELL,)	
)	
Plaintiff,)	Civil Action File No.
vs.)	2:16-cv-04946-TJS
)	
AMCOL SYSTEMS, INC.)	
)	
Defendant.)	
)	

DEFENDANT'S MOTION TO DISMISS

COMES NOW, AMCOL Systems, Inc., (hereinafter referred to as "Defendant"), Defendant in the above captioned case and moves this Court pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss Plaintiff's Complaint for failure to state a claim upon which relief can be granted. In support of this Motion, Defendant respectfully refers this Honorable Court to the accompanying Brief.

WHEREFORE, Defendant respectfully requests that this Motion be granted and that Plaintiff's Complaint be dismissed with prejudice.

THE LAW OFFICES OF RONALD S. CANTER, LLC

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CERTIFICATE OF SERVICE

This is to certify that on September 21, 2016 I have served a copy of the within and foregoing Defendant's Motion to Dismiss by first class mail, postage prepaid to:

Joureย Newell
409 Brandywine Ln
King of Prussia, Pennsylvania 19406

/s/ Ronald S. Canter, Esquire

Ronald S. Canter, Esquire